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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PENDLETON DIVISION**

OREGON WILD HORSE ORGANIZATION, et al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF THE
INTERIOR, BUREAU OF LAND MANAGEMENT,
et al.,

Defendants.

Case No. 2:24-cv-01673-HL

The Honorable Karin J. Immergut

**DECLARATION OF DONALD
ROTELL**

I, Donald Rotell, state the following:

1. I have been employed by the Bureau of Land Management (BLM) an agency of the U.S. Department of the Interior, since May 2002.
2. I have been the District Manager for the Burns District Oregon since November of 2024. In my capacity as District Manager, I, among other things, provide direction for

multiple-use management of public lands, including oversight of the Burns District's implementation of the BLM's Wild Horse and Burro Program.

3. In my role as District Manager, I coordinate with the BLM Oregon's Wild Horse and Burro Specialist regarding any wild horse gathers within the Burns District and their placement on the BLM's nationwide Tentative Wild Horse and Burro Gather and Fertility Control Schedule for each fiscal year. I am the authorized officer with delegated authority to issue decisions to gather and remove wild horses in the Burns District under the Wild and Free-Roaming Horse and Burro Act of 1971 (Wild Horse Act).
4. The BLM conducts population management gathers after determining that an overpopulation exists on a given area of the public lands and that action is necessary to remove excess animals to restore a thriving natural ecological balance to the range and protect the range from deterioration associated with overpopulation, pursuant to Section 3(b)(2)(iv) of the Wild Horse Act. I made this determination for the Kiger and Riddle Herd Management Areas (HMA), as documented in the Decision Record signed on July 22, 2024.
5. The BLM's "FY2025 Tentative Wild Horse and Burro Gather and Fertility Control Schedule as of June 3, 2025" (National Gather Schedule) currently identifies a planned population management gather to occur in the Kiger HMA from July 21, 2025, through August 6, 2025. The National Gather Schedule identifies five-hundred wild horses intended for permanent removal from the HMA and an additional twenty horses to be treated with fertility control and returned to the HMA.

6. The BLM's "FY2025 Tentative Wild Horse and Burro Gather and Fertility Control Schedule as of June 3, 2025" currently identifies a planned population management gather to occur in the Riddle Mountain HMA from August 7, 2025, through August 15, 2025. The National Gather Schedule identifies 225 wild horses intended for permanent removal from the HMA and an additional twenty horses to be treated with fertility control and returned to the HMA.
7. To allow adequate consideration of the issues raised by the parties in the above captioned case on the merits, the BLM has decided to cancel the planned population management gathers referenced in Paragraphs 5 and 6 above and withdraw them from the BLM's National Gather Schedule.
8. In addition, the BLM has decided not to conduct any additional population management gathers pursuant to the Kiger and Riddle Mountain HMAs Wild Horse Population Management Plan at issue in this case until the Honorable Magistrate Judge, Andrew D. Hallman, or any successor, has issued a findings and recommendation report on the merits of this matter in the above-captioned case, or until July 2026, whichever comes first.
9. If an emergency gather becomes necessary prior to that date, for example in response to catastrophic wildfire or drought conditions, the BLM will follow its standard procedures for emergency wild horse gathers, as documented in the BLM's Wild Horse and Burro Handbook, H-4700-1, and BLM Policy Manual 4720.22. The BLM will also provide notice to Plaintiffs in the above-captioned case prior to potential emergency gathers on the Kiger or Riddle Mountain HMAs that occur before July

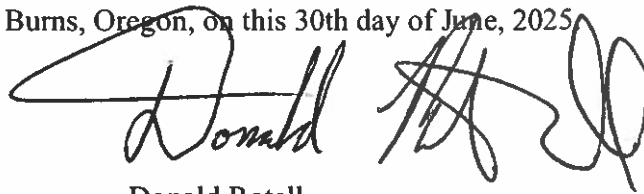
2026, or before the magistrate judge issues a findings and recommendation report on the merits in the above-captioned case, whichever is sooner.

10. Similarly, if a nuisance gather becomes necessary to remove wild horses that have strayed onto private property, the BLM will follow its standard procedures for gathers conducted pursuant to Section 4 of the Wild Horse Act.

11. The BLM intends to update its FY2025 Tentative Wild Horse and Burro Gather and Fertility Control Schedule to reflect the above-mentioned changes in gather plans.

This declaration is made under the provision of 28 U.S.C. § 1746. I declare under penalty of perjury that the foregoing is true and correct to the best of my current knowledge, information, and belief.

Executed in Burns, Oregon, on this 30th day of June, 2025,

A handwritten signature in black ink, appearing to read "Donald Rotell", followed by a stylized flourish or second signature.

Donald Rotell
District Manager
Burns District Office
Bureau of Land Management